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Attorneys for Defendant,  
**MICHAEL SCOTT WOODS, M.D.**  
(erroneously sued and served herein as  
**DR. SCOTT WOODS**)

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

**JULIA HUBBARD and KAYLA**  
**GOEDINGHAUS,**

**Plaintiffs,**

**v.**

**TRAMMELL S. CROW, JR., et al.,**

**Defendants.**

Case No. 2:22-cv-7957-FLA-MAA

Assigned to Honorable  
Fernando L. Aenlle-Rocha

**DECLARATION OF DEFENDANT**  
**MICHAEL SCOTT WOODS, M.D.**  
**IN SUPPORT OF MOTION TO**  
**DISMISS FOR LACK OF**  
**PERSONAL JURISDICTION**

Date: March 10, 2023  
Time: 1:30 p.m.  
Place: Courtroom 6B

Trial Date:           None Set

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**DECLARATION OF DEFENDANT MICHAEL SCOTT WOODS, M.D.**

I, Michael Scott Woods, M.D. hereby declare as follows:

1. I am a named defendant in this matter. I make this declaration in support of my Motion to Dismiss based on lack of personal jurisdiction. I have personal knowledge of my involvement and/or lack there of the allegations set forth in the Complaint and in turn the contents of this declaration and, if called upon as a witness, I could and would competently testify to the following facts.

2. I received copies of the documents which I believe were the summons and complaint in this matter at my office in Plano, Texas. Those documents were actually given to my assistant at my office and not to me personally.

3. At the time this matter was filed in or around November, 2022 and for 33 years prior thereto, I lived in Texas. My home was and continues to be in Carrollton, Texas. At all times referenced in the complaint, I lived in Texas and intend to continue living in Texas for the foreseeable future.

4. I have never lived in California at any time in my life. I have never owned real property in California. I have never leased or rented real property in California.

5. In the last 10 years, my only visits to California were in 2020 to visit colleges with my son.

6. I have never been involved in litigation in California as a plaintiff or a defendant until the instant action.

7. All of my professional work is conducted in Texas. I have never worked in California. I did not treat plaintiff Julia Hubbard in California. Rather, all of that treatment occurred in Texas. I have never treated plaintiff Kayla Goedinghaus to my knowledge.

8. To my knowledge, I have not had any accounts with a California bank at any time. I have never paid any personal or business taxes in California.

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1           9. I have never been in California with either plaintiff. I have never been  
2 in California with any of the named defendants as far as I am aware.

3           10. To my knowledge, the only communications I have had with anyone in  
4 this lawsuit were with: 1) plaintiff Julia Hubbard, who was my patient for a period  
5 of time and those communications would have occurred in my office in Texas; and  
6 2) defendant Joseph Bolin, M.D. who is a colleague of mine in Texas, and with  
7 whom I spoke generally about patients.

8           11. Because of my lack of connections with California, coupled with the  
9 fact that whatever conduct is being alleged against me in this case would have  
10 occurred in Texas, litigating this case in California makes no sense to me and  
11 imposes a significant burden on me both personally and financially if I am required  
12 to travel to California to defend myself at trial and during the discovery period.

13           12. I have never agreed to jurisdiction in California, nor have I  
14 purposefully and/or intentionally availed myself to the benefits of the laws of  
15 California. I live and work in Texas and I have for 33 years. I simply have no  
16 meaningful contacts with California that would justify imposing the burden of  
17 defending this case in that State.

18           I declare under penalty of perjury under the laws of the United States of  
19 America that the foregoing is true and correct.

20           Executed in Plano, Texas, on February 6, 2023.

21  
22 By: 

23 Michael Scott Woods, M.D.  
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**PROOF OF SERVICE**

**Hubbard v. Crow**  
**Case No. 2:22-cv-7957-SK**

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 10960 Wilshire Boulevard, 18th Floor, Los Angeles, CA 90024-3804.

On February 8, 2023, I served the following document(s) described as **DECLARATION OF DEFENDANT MICHAEL SCOTT WOODS, M.D. IN SUPPORT OF MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 8, 2023, at Los Angeles, California.

/s/ Jessica Avila Gonzales  
Jessica Avila Gonzales